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8 *Lead Counsel for Direct Purchaser Class*

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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14
15 **IN RE STATIC RANDOM ACCESS**
16 **MEMORY (SRAM) ANTITRUST**
17 **LITIGATION**

18 **This Document Relates To:**

19 **ALL DIRECT PURCHASER ACTIONS**

20 Case No. 4:07-md-01819-CW

21 MDL No. 1819

22 **DECLARATION OF MARK**
23 **SKOWRONSKI IN SUPPORT OF**
24 **PLAINTIFFS': (1) OPPOSITION TO**
25 **SAMSUNG'S MOTION FOR**
SUMMARY JUDGMENT AND/OR
PARTIAL SUMMARY JUDGMENT
IN DIRECT PURCHASER ACTIONS;
(2) OPPOSITION TO CYPRESS
SEMICONDUCTOR
CORPORATION'S MOTION FOR
SUMMARY JUDGMENT OR, IN THE
ALTERNATIVE PARTIAL
SUMMARY JUDGMENT; AND (3)
OPPOSITION TO DEFENDANTS'
JOINT MOTION RAISING FACTUAL
CHALLENGE TO SUBJECT
MATTER JURISDICTION OVER
FOREIGN CONDUCT

1 I, Mark Skowronski, declare and state as follows:

2 1. I am Vice President of Supply Chain Operations and Quality at Westell
3 Technologies, Inc. and Westell, Inc. (“Westell”). I make this declaration pursuant to 28 U.S.C. §
4 1746, and in support of Plaintiffs’: (1) Opposition to Samsung’s Motion for Summary Judgment
5 and/or Partial Summary Judgment in Direct Purchaser Actions; and (2) Opposition to Cypress
6 Semiconductor Corporation’s Motion for Summary Judgment or, in the Alternative Partial
7 Summary Judgment; and (3) Opposition to Defendants’ Joint Motion Raising Factual Challenge
8 to Subject Matter Jurisdiction Over Foreign Conduct.

9 2. At least from June 2003 through September 2007, Westell made SRAM purchases
10 directly from Integrated Silicon Solution Inc. (“ISSI”), a supplier of SRAM and a former
11 Defendant in the above-captioned litigation. ISSI entered into a settlement which was granted
12 final approval by the Court and judgment has been entered. *See* Dkt. No.1026.

13 3. Westell’s SRAM purchases from ISSI are reflected in Excel spreadsheets that were
14 electronically Bates-numbered WESTELL000553 and WESTELL001653, and which were
15 created from purchase records kept in the normal course of Westell’s business and which reflect
16 information that was known at or near the time by Westell purchasing personnel who created
17 such records. A true and correct copy of WESTELL000553 (printed) is attached hereto as
18 Exhibit A. A true and correct copy of WESTELL001653 (printed) is attached hereto as Exhibit
19 B.

20 4. Westell occasionally purchases SRAM for testing and development (for possible
21 use in Westell products), and Westell may make SRAM purchases in the future, including
22 directly from SRAM suppliers named as Defendants in the above-captioned litigation.

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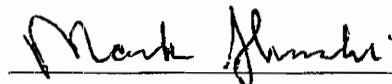
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1 5. Attached as Exhibit C are true and correct copies of invoices from ISSI for
2 Westell's purchases of SRAM directly from ISSI, as well as true and correct copies of Westell's
3 payment records, including checks, for such purchases. These documents, WESTELL.000011-
4 72, were kept in the normal course of Westell's business and reflect information that was known
5 at or near the time the documents were received by Westell purchasing personnel or generated
6 by Westell accounts payable personnel.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

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10 Executed on this 24 day of August, 2010 at Aurora, Illinois.

11 By:



13 Mark Skowronski
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